

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** ) **Case No.** 17-21251-TPA  
Kim M. Shields, ) **Chapter 13**  
                    ) )  
                    **Debtor,** ) **Related to Claim No.** 3  
Kim M. Shields, ) **Related Document No.** 89  
                    ) **Hearing Date:** 05/15/19 @ 11:00 a.m.  
                    **Objector,** ) **Response Due:** 04/11/19  
                    vs. ) )  
Wilmington Trust, N.A. as Trustee ) **Document No.** 90  
for MFRA Trust,  
                    **Respondent.**

**NOTICE OF HEARING AND RESPONSE DEADLINE REGARDING MOTION OF  
Kim M. Shields for DEBTOR'S OBJECTION TO THE NOTICE OF MORTGAGE  
PAYMENT CHANGE DATED MARCH 4, 2019**

**TO THE RESPONDENT(S):**

You are hereby notified that the above Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion no later than **April 11, 2019**, (i.e. seventeen (17) days after the date of service below), in accordance with Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedure of the presiding judge as found on the Court's webpage at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

You should take this Notice and Motion to a lawyer at once.

A hearing will be held on **May 15, 2019, at 11:00 a.m. before Judge Thomas P. Agresti in Courtroom C, 54<sup>th</sup> Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219**. Only a limited time of 10 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

**Dated:** March 25, 2019

**BY:** /s/ Donald R. Calaiaro

Donald R. Calaiaro, Esquire, PA I.D. #27538  
[dcalaiaro@c-vlaw.com](mailto:dcalaiaro@c-vlaw.com)

**BY:** /s/ David Z. Valencik

David Z. Valencik, Esquire, PA I.D. #308361  
[dvalencik@c-vlaw.com](mailto:dvalencik@c-vlaw.com)

CALAIARO VALENCIK

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**CERTIFICATE OF SERVICE OF NOTICE OF HEARING AND DEBTOR'S  
OBJECTION TO THE NOTICE OF MORTGAGE PAYMENT CHANGE DATED**  
**MARCH 4, 2019**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on March 25, 2019.

**Service by First-ClassMail:**

Kim M. Shields 1212 Harrow Hill Court Coraopolis, PA 15108

**Service by NEF:**

Karina Velter on behalf of Creditor Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2016-1; [amps@manleydeas.com](mailto:amps@manleydeas.com)

James Warmbrodt on behalf of Creditor Fay Servicing as servicer for Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2016-1

[bkgroup@kmllawgroup.com](mailto:bkgroup@kmllawgroup.com)

Office of the United States Trustee; [ustpregion03.pi.ecf@usdoj.gov](mailto:ustpregion03.pi.ecf@usdoj.gov)

Ronda J. Winnecour; [cmevf@chapter13trusteedpa.com](mailto:cmevf@chapter13trusteedpa.com)

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First-Class Mail or Electronic Notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

**Executed on:** March 25, 2019

/s/ Donald R. Calaiaro

**Donald R. Calaiaro, Esquire, PA I.D. #27538**

[dcalaiaro@c-vlaw.com](mailto:dcalaiaro@c-vlaw.com)

/s/ David Z. Valencik

**David Z. Valencik, Esquire, PA I.D. #308361**

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